

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

IN RE: §
§
EARTHSNAP, INC., § CASE NO. 24-60363
§ (Chapter 7)
DEBTOR §

TRUSTEE’S APPLICATION FOR AUTHORITY TO EMPLOY COUNSEL

14-Day Negative Notice:

Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney if you have one in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal basis for opposing the relief.

No hearing will be conducted on this motion unless a written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE shown in the certificate of service unless the court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The court reserves the right to set a hearing on any matter.

TO THE HONORABLE JOSHUA P. SEARCY U.S. BANKRUPTCY JUDGE:

Areya Holder Aurzada (the “Trustee”) in her capacity as the Chapter 7 trustee for EarthSnap, Inc. (the “Debtor”) files her Application for Authority to Employ Counsel for the Trustee (“Application”) as follows:

1. On June 17, 2024, Debtor filed with this Court a voluntary petition under Chapter 11 of the Bankruptcy Code. On April 21, 2025, the Bankruptcy Court issued an order converting the case to Chapter 7.
2. Areya Holder Aurzada was appointed as the Chapter 7 Trustee of the Debtor’s bankruptcy estate and continues to serve that capacity.

3. Trustee requests authority to employ the law firm of Quilling, Selander, Lownds, Winslett & Moser, P.C. (“QSLW&M”) as her general counsel in this Chapter 7 case pursuant to §§327(a) and (d) of the Bankruptcy Code.

4. Trustee believes that the employment of QSLW&M as counsel for the Trustee would be in the best interest of the creditors and of this estate since the Trustee has determined that there are assets to be administered.

5. Trustee has selected the law firm of QSLW&M for the reason that it has considerable experience in matters of this character, and the Trustee believes that QSLW&M is well qualified to represent the Trustee herein.

6. The professional services which QSLW&M are to render to the Trustee include but are not limited to, the following:

- a. To advise and consult with the Trustee concerning questions arising in the conduct of the administration of the estate and concerning the Trustee’s rights and remedies with regard to the estate’s assets and the claims of secured, priority and/or unsecured creditors and other parties in interest;
- b. To assist the Trustee in determining the extent of property of the estate;
- c. To investigate and pursue both litigation claims and avoidance claims on behalf of the bankruptcy estate;
- d. To appear for, prosecute, defend, and represent the Trustee’s interest in all matters related to this bankruptcy case;
- e. To review proofs of claim filed against the Debtor’s estate, prepare appropriate objection to claims and to represent the Trustee at any claim objection hearings;
- f. To give the Trustee legal advice with respect to her duties as Trustee;
- f. To take such action as is necessary to preserve, protect and collect property of the estate;
- g. To prepare on behalf of the Trustee all necessary applications, answers, orders, objections, reports and other legal documents; and
- h. To perform any and all other legal services for the Trustee which may be necessary herein.

7. The terms of employment of QSLW&M as agreed to by the Trustee and subject to the approval of this Court, are that certain attorneys and personnel within the firm will undertake this representation at their respective standard hourly rates charged to all other clients whether in bankruptcy or non-bankruptcy related matters. The Trustee has been informed that the normal hourly billing rates of QSLWM range from \$350.00 to \$650.00 per hour for shareholders and \$250.00 to \$325.00 per hour for associates. The rate for paralegals is \$150.00 to \$215 per hour. The hourly rates charged by QLSW&M are subject to periodic adjustment to reflect changing economic conditions and increasing experience and expertise of its attorneys and personnel in the area of bankruptcy law. It is contemplated that QSLW&M will seek compensation from the Debtor's estate based upon its normal hourly billing rates. It is further contemplated that QSLW&M will seek interim compensation during the case as permitted by 11 U.S.C. §331.

8. To the best of Trustee's knowledge, the firm of QSLW&M has no relationship or connection with creditors of the Debtor's estate or other parties in interest which would raise a possible disqualification or conflict of interest herein in matters upon which it is to be employed as counsel for the Trustee as evidenced by the Declaration of John Paul Stanford attached hereto as **Exhibit "A."**

WHEREFORE, PREMISES CONSIDERED, Trustee prays that she be authorized to employ the law firm of Quilling, Selander, Lownds, Winslett & Moser, P.C. to represent her as Trustee in this proceeding, and that she have such other and further relief to which she may be justly entitled.

Respectfully submitted,

By: /s/ Areya Holder Aurzada
Areya Holder Aurzada, Chapter 7 Trustee

QUILLING, SELANDER, LOWNDS,
WINSLETT & MOSER, P.C.
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Dallas, Texas 75201
(214) 880-1851 (Telephone)
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By: /s/ John Paul Stanford
John Paul Stanford
State Bar No. 19037350

PROPOSED ATTORNEYS FOR TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of June 2025, a true and correct copy of the foregoing instrument has been served via the Court's CM/ECF notification system (or by other means identified below) on all parties in this case entitled to receive such notification, including the following:

Office of the U.S. Trustee
110 N. College Ave., Suite 300
Tyler, TX 75702

EarthSnap, Inc.
6961 Park Slope
Tyler, TX 75703

/s/ John Paul Stanford